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NOTES OF CASES.

TELEGRAPH COMPANIES—LIABILITY FOR MENTAL ANGUISH—SEC. 1294i (10), VA. CODE 1904.—The right to recover damages for mental anguish from a telegraph company is sustained in *Green v. Western U. Teleg. Co. (N. C.)*, 67 L. R. A. 985, where, by reason of its failure to deliver a telegram, friends fail to meet a sixteen-year-old girl, who arrives after midnight in a strange city, and is compelled to drive 2 miles in company with a strange driver, in search of their residence.

A different rule has been adopted in Virginia under sec. 1294i (10), Va. Code 1904. See 10 Va. Law Reg. 829.

CRIMINAL LAW—EVIDENCE—ADMISSIONS TO JUDGE.—The judge who convened a grand jury which was investigating a crime was held, in *People v. Pratt* (Mich.), 67 L. R. A. 923, not to be permitted to give in evidence a confession made to him by a witness called before such jury, who was subsequently indicted and placed on trial, where the witness, being unable to obtain advice from a lawyer in whom he had confidence, went to the judge, and, upon stating his difficulty, was told by the judge that he could give him no advice, but that he should tell the truth, whereupon the witness made the confession. The admissibility, in evidence, of communications made to persons serving in a judicial capacity, is the subject of a note to this case.

CONSTITUTIONAL LAW—MUNICIPAL CORPORATION — ORDINANCES — FREEDOM OF SPEECH.—An ordinance declaring it unlawful to hold public meetings in the streets of the city without the consent of the municipal authorities is held, in *Fitts v. Atlanta* (Ga.), 67 L. R. A. 803, not to be unconstitutional as curtailing the liberty of speech, or making an arbitrary discrimination in favor of some persons against others.

MUNICIPAL CORPORATIONS — SURFACE WATER — INJURY FROM SAME.—A municipal corporation which has turned into a stream flowing through its surface water falling within its watershed and, for the maintenance of the public health, has cleaned its bed, is held, in *A. L. Lakey Co. v. Kalamazoo* (Mich.), 67 L. R. A. 931, not to be liable to a riparian owner for failure to remove obstructions placed in the stream by another riparian owner, so that the water is dammed back to the injury of the former.

ASSESSMENT OF TAXES—SECS. 492a, 493, 3326a, VA. CODE 1904.—Sec. 492a, Va. Code 1904, providing that all notes, bonds, and other evidences of debt held subject to the order of any court, etc., whether executed for the purchase price of real or personal property, shall be taxed to the clerk of said court, etc., and shall be exempted from taxation in the name